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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Sean Bennett, an individual,
Plaintiff,

vs.

City of Phoenix, a governmental entity;
American Airlines, Inc., a foreign
corporation; Officer Joel Cottrell and Jane
Doe Cottrell, a married couple; Officer
Benjamin Denham and Jane Doe Benham,
a married couple; Officer Todd Blanc and
Jane Doe Blanc, a married couple; Officer
Peru and Jane Doe Peru, a married couple;
Sergeant Hogan and Jane Doe Hogan, a
married couple,
Defendants.

No.: CV-23-02425-PHX-ROS (DMF)

**STIPULATED MOTION TO
EXTEND DEADLINES**

(Third Request)

(Assigned to the Honorable Roslyn O.
Silver and referred to the Honorable
Deborah M. Fine for all pretrial
proceedings)

Through counsel undersigned, the parties hereby stipulate and agree to extend all existing deadlines in this action by approximately sixty days each, in accordance with the [Proposed] Order attached hereto.

Good cause exists for such extension. Plaintiff and his counsel have been working to collect records of Plaintiff's medical treatment. However, as they are spread around multiple facilities - including Federal facilities – delays have arisen. Counsel for the parties have been in regular communication regarding discovery and have worked together to

1 accommodate schedules for deposition purposes. Both sides agree that having as full of a
2 medical treatment picture as possible is necessary prior to conducting any depositions.

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4 Additionally, Plaintiff's counsel has had some unforeseen family issues that required
5 his attention, necessitating re-scheduling of depositions and meetings. Moreover, his
6 duties in other matters have recently required multiple Ninth Circuit briefings, extensive
7 motion practice, and trial preparation for a trial that was ultimately canceled a week before
8 it was scheduled.

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10 For all the foregoing reasons, the parties submit that good cause exists for existing
11 deadlines in this matter to be extended as follows:

- 12 1. The last day to commence lay depositions, from June 2, 2025 to **August 1,**
13 **2025;**
- 14 2. The last day to complete fact discovery, from June 9, 2025 to **August 8,**
15 **2025;**
- 16 3. The last day for Plaintiff to serve full and complete expert disclosures, from
17 June 30, 2025 to **August 29, 2025;**
- 18 4. The last day to engage in good faith settlement talks, from July 11, 2025 to
19 **September 11, 2025;**
- 20 5. The last day to file Joint Report on settlement talks, from July 18, 2025 to
21 **September 18, 2025;**
- 22 6. The last day for Defendant to serve full and complete expert disclosures,
23 from July 21, 2025 to **September 22, 2025;**
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1 7. The last day to serve rebuttal expert disclosures, from August 11, 2025 to
2 **October 10, 2025;**

3 8. The last day to complete expert discovery, from September 2, 2025 to
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5 **November 3, 2025;**

6 9. The last day to file dispositive or Daubert motions, from September 8, 2025
7 **to November 7, 2025.**

8 **RESPECTFULLY SUBMITTED** this 20th day of May 2025.
9

10 **MILLS + WOODS LAW, PLLC**

11
12 By /s/ Sean A. Woods
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18
19 **WILSON, ELSER, MOSKOWITZ, EDELMAN &**
20 **DICKER LLP**

21 By /s/ Sarena Kustic, Esq. (w/ permission)
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CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2025, I electronically transmitted the foregoing document to the Clerk's Office using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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/s/ Ben Dangerfield